

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Ford Motor Company
Norfolk, Virginia
Permit No. VA60208

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Ford Motor Company has applied for a Title V Operating Permit for its Norfolk Truck Assembly facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Regional Permit Manager: _____ Date: _____

FACILITY INFORMATION

Permittee

Ford Motor Company
2424 Ford Drive
Norfolk, Virginia

Facility Name

Ford – Norfolk Assembly Plant
Ford Motor Company
2424 Ford Drive
Norfolk, Virginia 23523

AIRS ID No. 51-710-00009

SOURCE DESCRIPTION

SIC Code: 3711 – Final assembly and finishing of Motor Vehicles and Car Bodies

Facility Description: The plant assembles automotive trucks from manufactured parts. The main process steps are body assembly, painting, final assembly and miscellaneous production support. There are no alternative operating scenarios associated with this application. The new painting facility was brought on-line during calendar year 1991 and was permitted at that time with a calculated baseline VOC emission level of 1183 tons per year. During the past nine years, some minor changes to the plant were made to improve the quality of the finished product. The permitted emission level for VOC's has increased slightly as production changes are made to adjust the jobs per hour through the plant. As the coating process has been refined over the model years, improved coating materials have allowed for reduced usage per vehicle and higher efficiencies in solids transfer. Through the continued application of sound engineering design changes and new coating technology, Ford has managed to incrementally ratchet-up truck production, over the years, without any significant increase in coating throughputs or the resulting VOC emissions.

The Norfolk Assembly Plant is subject to the NSPS, Subpart MM; Standards of Performance for Automobile and Light Truck Coating Operations. The requirements of this New Source Performance Standard deal primarily with VOC content of coatings by class, transfer efficiencies of solids and the destruction efficiency of the control device. Compliance with the NSPS is checked by use of performance tests in the form of equations. Two of the monthly calculations that are required at the plant are (1.) monthly Kg of VOC per liter of applied solids and (2.) monthly Kg of VOC per liter of applied solids emitted after the incinerator.

The Ford plant has emission units that are uncontrolled with respect to the VOC emissions and several previously modified units that are controlled by a 'Carbon wheel' process. The Carbon wheel concentrates the emissions from several units and allows the capture of VOC's from booths that have low concentrations of solvents. This approach also enables the RTO's to be sized much smaller as they are only required to handle the purge flow from the carbon panels and not the much larger flow of booth air. Product quality improvement projects over the last ten years involved replacement of manual spraying units with robot controlled spray and bell sprayers. Eliminating the human element from some of the booths allows for adjustment of the required airflow for that booth section, which leads to, improved product quality and better capture of emissions. The Title V permit is based on the NSR permit issued February 12, 1999 which incorporated several changes in the coating allocations, process by process, and allowed for a small increase in permitted emissions.

The facility is a Title V major source of Volatile Organic Compounds and HAP's. This source is located in an attainment area for all pollutants, and is a major source. The facility was previously permitted under a Major NSR Permit, issued on December 11, 1991, and amended on December 2, 1993, June 30, 1994 and February 12, 1999.

COMPLIANCE STATUS

The facility was last inspected on July 21, 2000. The inspection indicated that the facility is in compliance with all regulations and the permit conditions. Ford is subject to the NSPS for Automobile and Light Truck Coating Facilities, Subpart MM. Compliance with this requirement involves the calculation of coating transfer efficiencies in the paint booths and requires monthly calculations and recordkeeping. Ford has a previously established baseline for VOC emissions of 1183 tons per year (prior to 1991 and the new painting facility). There have been several permit amendments, mostly to adjust the VOC emission levels from one area to another and/or to evaluate a booth area for BACT. This facility is not limited by production of finished vehicles, but only by the resulting emissions from the coating and sealing processes.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
PR1	PR1	Natural gas Water Heater	30 mmBtu per Hour	N/A	N/A		N/A
PR2	PR1	Natural gas Water Heater	30 mmBtu per Hour	N/A	N/A		N/A
EC2	EC2 -- 1,2,3	Natural gas fired oven	28 mmBtu per hour	N/A	N/A		N/A
PS2	PS2	Natural gas fired oven	24 mmBtu per hour	N/A	N/A		N/A
PS3	PS3	Natural gas fired air heater	80 mmBtu per hour	N/A	N/A		N/A
PS5	PS5	Natural gas fired air heater	20 mmBtu per hour	N/A	N/A		N/A
ME2	ME2 -- 1,2,3	Natural gas fired oven	16 mmBtu per hour	N/A	N/A		N/A
ME3	ME3	Natural gas fired air heater	97 mmBtu per hour	N/A	N/A		N/A
ME5	ME5	Natural gas fired air heater	18 mmBtu per hour	N/A	N/A		N/A
TT2	TT2 -- 1,2,3	Natural gas fired oven	16 mmBtu per hour	N/A	N/A		N/A
TT3	TT3	Natural gas fired air heater	54 mmBtu per hour	N/A	N/A		N/A
RTO1	RTO1- 1,2	Regenerative thermal oxidizer	16 mmBtu per hour	Controls VOC's	RTO1	VOC/HA P	2/12/99
RTO2	RTO2	Regenerative	32 mmBtu	Controls VOC's	RTO2	VOC/HA	2/12/99

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		thermal oxidizer	per hour			P	
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Process A – Truck Assembly Operations							
Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
BS1	N/A	Body Shop Sealers	85,000 gallons/Yr	N/A fugitives	N/A		2/12/99
PR1	PR1	Phosphate hot water	30 mmBtu per hour	N/A	N/A		N/A
PR2	PR1	Phosphate hot water	30 mmBtu per hour	N/A	N/A		N/A
SA1	SA1 -- 1,2	Sealer application	2.0 tons of VOC/Year	N/A	N/A		2/12/99
EC1	EC1 -- 1,2,3	E-coat dip tanks	55 vehicles per hour	Water-based coating	ECT	VOC based solvents	2/12/99
EC2	EC2 -- 1,2,3	E-coat oven	28 mmBtu per hour	N/A	N/A		2/12/99
EC3	EC3	E-coat scuff booth	55 vehicles per hour	Panel filters	ECSF	Particulate and PM10	2/12/99
PS1	PS1-- 1—14	Guidecoat (prime) spray booth – spray application	55 vehicles per hour	Water wall scrubber	PSCRB	Particulate and PM10	2/12/99
PS1	PS1, Zone 3	Guidecoat (prime) spray booth	55 vehicles per hour	Carbon wheel and RTO for Zone 3	RTO1	VOC's and HAP's	2/12/99
PS2	PS2-- 2—5	Guidecoat (prime) oven	24 mmBtu per hour	RTO	RTO2	VOC's and HAP's	2/12/99
PS3	PS3	Guidecoat (prime) air supply house	80 mmBtu per hour	Bag filters	ASH – 550	PM10	2/12/99
PS4	PS4	Guidecoat (prime) scuff booth	55 vehicles per hour	Panel filters	PSF	Particulate and PM10	2/12/99
PS5	PS5	E-coat, Guidecoat scuff booth air supply house	20 mmBtu per hour	N/A	N/A	N/A	2/12/99
ME1	ME1-- 1—22	Topcoat spray booth	55 vehicles per hour	Water wall scrubber and filter house	TCSFH	Particulate and PM10	2/12/99
ME1	ME1, Zones 3,4,5,8	Topcoat spray booth	55 vehicles per hour	Carbon wheel and RTO for Zones 3, 4, 5, 8	RTO2	VOC's and HAP's	2/12/99
ME2	ME2--	Topcoat oven	16 mmBtu	RTO	RTO2	VOC's and	2/12/99

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	1,2,3		per hour			HAP's	
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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ME3	ME3	Topcoat air supply house	97 mmBtu per hour	Bag filters	ASH – 551	PM10	2/12/99
ME4	ME4	Topcoat touchup/scuff booth	55 vehicles per hour	Bag filters and panel filters	TCTUF	Particulate and PM10	2/12/99
ME5	ME5	Topcoat/Tutone scuff booth air supply house	18 mmBtu per hour	Bag filters	ASH – 554	PM10	2/12/99
TT1	TT1–1—18	Tutone/repair spray booth	55 vehicles per hour	Water wall scrubber	TTSCRB	Particulate and PM10	2/12/99
TT2	TT2--1,2,3	Tutone/repair oven	16 mmBtu per hour	RTO	RTO1	VOC's and HAP's	2/12/99
TT3	TT3	Tutone/repair air supply house	54 mmBtu per hour	N/A	N/A	N/A	2/12/99
TT4	TT4	Tutone/repair touchup/scuff booth	55 vehicles per hour	Panel filters	TTREPF	Particulate and PM10	2/12/99
WA1	WA1	Windshield installation	55 vehicles per hour	N/A	N/A	N/A	2/12/99
FR1	FR1 - 1—5	Final repair booth	6.4 tons of VOC per year	N/A	N/A	N/A	2/12/99
SV1	N/A	Purge, cleaning and body wipe	180.5 tons of VOC per year	N/A	N/A	N/A	2/12/99

The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement

EMISSIONS INVENTORY

A copy of the 1999 annual emission update is attached as Attachment A. The facility provided, as requested, an estimate of their actual emissions for the operating year of 1998. For 1996, the first year that fees were assessed, Ford Motor Company was billed for a total of 812.4 tons of criteria pollutants, which generated a fee of \$26,151.16. Payment of this bill was recorded on October 3, 1997 and was paid in full at that time. The actual emissions are summarized in the following tables.

1999 Actual Emissions

	Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
Plant	747.2	33.4	0.2	9.3	39.8
Total	747.2	33.4	0.2	9.3	39.8

1999 Facility Hazardous Air Pollutant Emissions (trace pollutants which result in annual emissions of less than 0.5 Tons are not listed)

Pollutant	Hazardous Air Pollutant Emissions
106-46-7, P-Dichlorobenzene	Less than 0.5 Tons per Year
71-43-2, Benzene	Less than 0.5 Tons per Year
50-00-0, Formaldehyde	Less than 0.5 Tons per Year
Various, Glycol Ethers	36.7 Tons per Year
7647-01-0, Hydrogen Chloride	Less than 0.5 Tons per Year
N/A, Manganese and Compounds	Less than 0.5 Tons per Year
101-68-8, 4,4'-MethyleneBis(phenyl isocyanate)	Less than 0.5 Tons per Year
71-55-6, 1,1,1-Trichloroethane	Less than 0.5 Tons per Year
75-09-2, Methylene Chloride	Less than 0.5 Tons per Year
N/A, Nickel & Compounds	Less than 0.5 Tons per Year
127-18-4, Perchloroethylene	Less than 0.5 Tons per Year
108-88-3, Toluene	6.38 Tons per Year

EMISSION UNIT APPLICABLE REQUIREMENTS – (emission units ID# PR1, PR2, EC2, PS2, PS3, PS5, ME2, ME5, TT2, TT3, RTO1 and RTO2)

Limitations

The Ford paint facility was permitted December 11, 1991 and has permit amendments dated December 2, 1993, June 30, 1994 and February 12, 1999. The following limitations are applied to the fuel burning equipment, as installed in the present operation:

There are no limitations applied to the fuel burning equipment in the current permit. However, the following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

- < 9 VAC 5-40-900 “Existing Source Standard for Particulate Emissions” provides an emission limit based on the heat input max capacity of the combustion device.
- < 9 VAC 5-40-930 “Existing Source Standard for Sulfur Dioxide” provides an emission limit based on the heat input max capacity of the combustion device.
- < 9 VAC 5-50-80 “New/Modified Source Standard for Visible Emissions” - units may not emit greater than 20% opacity except for one six-minute period in any one hour of not more than 30% opacity (ref. 40 CFR 60, Appendix A. Method 9).
- < 9 VAC 5-50-20 “Facility and Control Equipment Maintenance or Malfunction” – at all times, facility, including associated air pollution control equipment, must be maintained and operated in a manner consistent with air pollution control practices for minimizing emissions.

Periodic Monitoring

The last permit amendment of February 12, 1999 does not list any emissions limits for the fuel burning equipment or any fuel throughputs either. However, standards for particulate and sulfur dioxide, plus monitoring for opacity have been applied to the boiler in conditions III.A.1, III.A.2 and III.B.1. Without any fuel throughput limits or corresponding calculated emission limits for criteria pollutants, we are left with the particulate, visible emissions and sulfur dioxide standards for fuel burning equipment that apply to this emissions unit.

Demonstration of Expected Emissions from the Aggregated Natural Gas burning equipment:

- < AP-42 lists the Natural gas emission factor as 1.9 lbs-PM per 10⁶ cubic feet of gas.
- < MAX heat input = 461 mmBtu/hour x 1 CF/1050 Btu = **439,050 SCF/hour maximum**.
- < MAX PM emissions = 1.9-lbs/10⁶ scf x 439,050 scf/hour = 0.834 lbs-PM/hour
- < 0.834 lbs is less than the standard of 5.9 lbs-PM per hour in condition III.A.1.
- < AP-42 lists the Natural gas emission factor as 0.6-lbs SO₂ per 10⁶ cubic feet of gas.
- < MAX SO₂ emissions = 0.6 lbs/10⁶ scf x 439,050 scf/hour. = 0.26 lbs-SO₂ /hour
- < 0.26 lbs/hour is less than the standard of 25.9 lbs/hour in condition III.A.2.

< No owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one, six-minute period in any one hour of not more than 30% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section. (9 VAC 5-50-80)

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include a logbook for recording any abnormal opacity observations, any Method 9 VEE required and corrective action taken to restore normal operations. Additional records are required to establish the fuel types to be burned in the fuel burning equipment. The listing of the DEQ-approved pollutant-specific emission factors for the criteria pollutants emitted from the fuel burning equipment along with calculations of these emissions.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit does not require any reporting, other than the 'Annual Compliance Certification' that the source must submit by March 1st for each calendar year per Condition VII.D.

Streamlined Requirements

The permit does not contain any streamlining of permit requirements.

EMISSION UNIT APPLICABLE REQUIREMENTS – (emission unit ID# BS1, PR1, PR2, SA1, EC1, EC2, PS1, PS2, PS3, PS4, PS5, ME1, ME2, ME3, ME4, ME5, TT1, TT2, TT3, TT4, WA1, FR1 and SV1)

Limitations

The following limitations are derived from the NSR permit issued February 12, 1999.

Particulate emissions from all sections of the Prime, Main Enamel and Tutone/Repair paint spray booths controlled by water wash scrubbers. Bag filters on Prime Bell (PS3), Main Enamel Basecoat Bell (ME3), Reciprocator (ME4), Robot (ME5) and Clearcoat Bell (ME-8) paint spray booths. Condition 3 of February 12, 1999 NSR permit.

Particulate emissions from the four scuff booths to be controlled by panel filters. Condition 4 of the February 12, 1999 NSR permit.

Volatile Organic Compound (VOC) emissions from the Prime Bell (PS3), Main Enamel Basecoat Bell (ME3), Reciprocator (ME4), Robot (ME5) and Clearcoat Bell (ME8) shall be concentrated with carbon wheels and burned in the RTO's. Condition 5 of the February 12, 1999 NSR permit.

Volatile Organic Compound emissions from the use of cleaning solvents will be controlled by work practices, in such areas as applicator cleaning, booth cleaning and general paint area cleaning. Condition 6 of the February 12, 1999 NSR permit.

VOC emissions from the Primecoat (E-coat) operation are limited to 24.4 lbs/hour and 53.8 tons per year. Condition 7 of the February 12, 1999 NSR permit.

VOC emissions from the Guidecoat (antichip + primer) operation are limited to 62.7 lbs/hour and 138.5 tons per year. Condition 8 of the February 12, 1999 NSR permit.

VOC emissions from the Topcoat (basecoat + clearcoat + solid enamel) operation are limited to 916.3 lbs/hour and 877.9 tons per year. Condition 9 of the February 12, 1999 NSR permit.

VOC emissions from the Sealer operation are limited to 2.4 lbs/hour and 2.0 tons per year. Condition 10 of the February 12, 1999 NSR permit.

VOC emissions from the Final Repair operation are limited to 6.7 lbs/hour and 6.4 tons per year. Condition 11 of the February 12, 1999 NSR permit.

VOC emissions from the Purge/Cleaning Solvent operation are limited to 152.6 lbs/hour and 180.5 tons per year. Condition 12 of the February 12, 1999 NSR permit.

Facility emissions, due to all processes except fuel burning are limited to:

Total Suspended Particulate	10.8 lbs/hour	26.6 tons/year
PM10	10.8 lbs/hour	26.6 tons/year
Volatile Organic Compounds	1165.1 lbs/hour	1259.1 tons/year
BCA (Ethylene glycol monobutyl ether acetate)	198.5 lbs/hour	414.2 tons/year
Butanol	73.6 lbs/hour	161.7 tons/year
Butoxyethanol	55.5 lbs/hour	122.1 tons/year
Butyl acetate	205.0 lbs/hour	439.6 tons/year
Diacetone alcohol	11.4 lbs/hour	17.3 tons/year
2-Ethoxyethanol	36.9 lbs/hour	3.1 tons/year
Ethyl acetate	127.2 lbs/hour	279.1 tons/year
Heptane	50.9 lbs/hour	111.6 tons/year
Hexane	18.5 lbs/hour	39.5 tons/year
Isobutanol	18.6 lbs/hour	39.9 tons/year
Isopropanol	31.9 lbs/hour	63.9 tons/year
Methyl ethyl ketone	38.5 lbs/hour	84.4 tons/year

Methanol	42.0 lbs/hour	90.1 tons/year
Methyl amyl ketone	208.2 lbs/hour	433.5 tons/year
Methylene chloride	130.4 lbs/hour	197.7 tons/year
Methyl isobutyl ketone	39.9 lbs/hour	74.1 tons/year
PGME (propylene glycol monmethyl ether)	55.9 lbs/hour	119.7 tons/year
Propanol	55.9 lbs/hour	119.7 tons/year
Stoddard solvent	68.6 lbs/hour	104.0 tons/year
Toluene	155.1 lbs/hour	333.5 tons/year
VM & P Naphtha	364.0 lbs/hour	373.9 tons/year
Xylene	339.7 lbs/hour	692.1 tons/year
Condition 13 of the February 12, 1999 NSR permit.		

VOC emissions in tons per year shall be calculated monthly as the sum of each consecutive 12 month period for the E-coat, Guidecoat, Topcoat, Sealer, Final Repair and Purge/Cleaning operations. Condition 14 of the February 12, 1999 NSR permit.

Visible emissions from the panel filters and scrubber systems limited to 5% and 10%. Condition 15 of the February 12, 1999 NSR permit.

Ford shall install, calibrate and maintain a temperature measurement device in each incinerator and continuously record the temperature while the unit is in operation. Condition 19 of the February 12, 1999 NSR permit.

Periodic Monitoring

Calculations of 'G' shall be done each month as a performance test, in accordance with NSPS Subpart MM to determine the kg of VOC used per liter of applied solids. Condition 16 of the February 12, 1999 NSR permit.

Calculations of 'N' for each coating operation controlled by an incinerator shall be done each month in accordance with NSPS Subpart MM to determine the kg of VOC per liter of applied solids – emitted after the incinerator. Condition 17 of the February 12, 1999 NSR permit.

Visible emissions from the panel filters and scrubber systems shall be monitored for compliance with permit conditions.

The expected emissions from the facility coating operations (booth sections which are not controlled by carbon wheels and thermal oxidizers are exactly equal to the VOC content of the materials throughputs, both on an hourly basis and yearly basis. The 1999 annual emission update is attached for reference and contains the amounts of criteria and HAP pollutants that were emitted for calendar 1999.

Reporting

Quarterly reports shall be submitted in accordance with 40 CFR 60.7 and NSPS Subpart MM,

describing each violation of the following limits:

- < The volume weighted monthly average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for prime coat operations,
- < The volume weighted monthly average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for guide coat operations, and
- < The volume weighted monthly average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for topcoat operations.

Condition 18 of the February 12, 1999 NSR permit.

Ford shall continuously record the incinerator temperature, during coating operations, in accordance with 40 CFR 60.7 and NSPS Subpart MM and submit written semi-annual reports of any temperature excursions. Negative reports are also required to be submitted in case there are no temperature excursions. Condition 20 of the February 12, 1999 NSR permit.

Recordkeeping

The permittee shall retain records of all emission data and operating parameters required to demonstrate compliance with the VOC emission limits in the permit. Records shall conform to the “Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations” (December 1988). Condition 21 of the February 12, 1999 NSR permit.

The permittee shall maintain records of all emission data and operating parameters to show compliance with the permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. Condition 22 of the February 12, 1999 NSR permit.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. The permittee shall allow authorized local, state and federal representatives upon presentation of credentials, to sample or test at reasonable times. Condition 24 of the February 12, 1999 NSR permit.

Streamlined Requirements

The permit does not contain any streamlining of permit requirements.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those

caused by upsets, within one business day.

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

- < 9 VAC 5 Chapter 50, Part II, Article 2: Standards of Performance for Odorous Emissions (Rule 5-2)
- < 9 VAC 5 Chapter 50, Part II, Article 3: Standards of Performance for Toxics Pollutants (Rule 5-3)

FUTURE APPLICABLE REQUIREMENTS

This facility is a major source of criteria pollutants and Hazardous Air Pollutants. The NSPS for Coating of Automobiles and Light-Duty Trucks, Subpart MM applies and the facility is currently in compliance with these requirements. The EPA has proposed a MACT for this source category within the next three years.

INAPPLICABLE REQUIREMENTS

Currently inapplicable requirements identified by the applicant include the following:

- < 9 VAC 5-50-80, Visible emissions are negligible for units BS1, SA1, SV1 and WA1.
- < 9 VAC 5-30 et al, Ambient air quality standards
- < 9 VAC 5-40-130 to 150, Emissions standards for odor
- < 9 VAC 5-40-160 to 230, Emission standards for toxic pollutants: existing sources
- < 9 VAC 5-40-240 to 280, 290 to 300, 320 to 330, 360 to 420, Emission standards for general process operations.
- < 9 VAC 5-40-430 to 3400, 3560 to 5120, 5350 to 5641, Emission standards "Certain Source Categories".
- < 9 VAC 5-40-3410 to 3550, Emission standards for VOC storage and transfer operations.
- < 9 VAC 5-50-130 to 150, Standards for odor: new and modified sources.
- < 9 VAC 5-50-160 to 230, Standards for toxics: new and modified sources.
- < 9 VAC 5-50-280, 290, 300, 310, 320, Standards of performance, PSD
- < 9 VAC 5-50-400 to 420, Standards of performance for new stationary sources.
- < 9 VAC 5-50-430 to 600, Standards of performance for medical waste incinerators.
- < 9 VAC 5-60 et al, NESHAP for existing, new and modified sources.
- < 9 VAC 5-80-1710 to 1970, PSD permits for stationary sources.
- < 9 VAC 5-80-360, Acid rain operating permits.
- < 9 VAC 5-500-10, Exclusionary general permit.
- < 40 CFR 50, National primary and secondary ambient air quality standards.
- < 40 CFR 52.21, PSD.
- < 40 CFR 61, NESHAP for radon, vinyl chloride mercury, etc.

COMPLIANCE PLAN

This source does not have the requirement of a compliance plan.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
I-SH1	Building space heaters natural gas emissions	9 VAC5-80-720C	NO _x , CO, SO ₂ , VOC, PM10, TSP, HAP's	less than 10 mmBtu/Hour
I-SO1	Sealer oven natural gas emissions	9 VAC5-80-720C	NO _x , CO, SO ₂ , VOC, PM10, TSP, HAP's	6.0 mmBtu/Hour
I-HW1	Paint shop water heaters	9 VAC5-80-720C	NO _x , CO, SO ₂ , VOC, PM10, TSP, HAP's	less than 10 mmBtu/Hour
I-AB1	Abatement boiler	9 VAC5-80-720C	NO _x , CO, SO ₂ , VOC, PM10, TSP, HAP's	8.4 mmBtu/Hour
I-AC1	Air conditioning fill	9 VAC5-80-720B	N/A	N/A
I-KS1	Kolene skid treatment, paint removal system	9 VAC5-80-720B	VOC, TSP, PM10	N/A
I-SG1	Body shop sanding and grinding	9 VAC5-80-720B	TSP, PM10, HAP's	N/A
I-OT1	Engine oil top-off	9 VAC5-80-720B	VOC	N/A
I-PD1	Phosphate dip/rinse	9 VAC5-80-720B	VOC, TSP PM10	N/A
I-BF1	Brake fluid fill	9 VAC5-80-720B	VOC	N/A
I-PS1	Power steering fluid fill	9 VAC5-80-720B	VOC	N/A
I-CL1	Chassis line lubricants	9 VAC5-80-720B	VOC	N/A
I-CF1	Coolant fill	9 VAC5-80-720B	VOC, HAP's	N/A
I-SR1	Spot repair area	9 VAC5-80-720B	VOC, HAP's, PM10, TSP	N/A
I-CC1	Cold cleaners	9 VAC5-80-720B	VOC	N/A
I-TF1	Transmission fluid fill	9 VAC5-80-720B	VOC	N/A
I-EL1	Engine line lubricants	9 VAC5-80-720B	VOC	N/A
I-WF1	Washer fluid fill	9 VAC5-80-720B	VOC, HAP's	N/A
I-GF1	Gasoline fill	9 VAC5-80-720B	VOC, HAP's	N/A
I-BT1	Brake fluid storage tank	9 VAC5-80-720B	VOC	N/A
I-AT1	Antifreeze tank	9 VAC5-80-720B	VOC, HAP's	N/A

I-AT2	50% antifreeze tank	9 VAC5-80-720B	VOC, HAP's	N/A
I-PT1	Power steering fluid Tank #1	9 VAC5-80-720B	VOC	N/A
I-PT2	Power steering fluid Tank #2	9 VAC5-80-720B	VOC	N/A
I-ER1	E-coat resin Tank #1	9 VAC5-80-720B	VOC, HAP's	N/A
I-ER2	E-coat resin Tank #2	9 VAC5-80-720B	VOC, HAP's	N/A
I-CT1	50% caustic Tank #1	9 VAC5-80-720B	No regulated pollutant	N/A
I-CT2	50% caustic Tank # 2	9 VAC5-80-720B	No regulated pollutant	
I-HW1	Hazardous Waste storage tank	9 VAC5-80-720B	VOC, HAP's	
I-RT1	134a tank	9 VAC5-80-720B	None	
I-FC1	Dilute ferric chloride tank	9 VAC5-80-720B	Negligible	
I-SA1	Sulfuric acid Tank #1	9 VAC5-80-720B	Negligible	
I-SA2	Sulfuric acid Tank #2	9 VAC5-80-720B	Negligible	
I-ET1	E-coat transfer Tank #1	9 VAC5-80-720B	VOC, HAP's	
I-ET2	E-coat transfer Tank #2	9 VAC5-80-720B	VOC, HAP's	
I-ET3	E-coat transfer Tank #3	9 VAC5-80-720B	VOC, HAP's	
I-PT1	Propane tank	9 VAC5-80-720B	VOC	
I-MT1	Methanol storage tank	9 VAC5-80-720B	VOC, HAP's	
I-SS1	Spent solvent tank	9 VAC5-80-720B	VOC, HAP's	
I-SP1	Spent purge tank	9 VAC5-80-720B	VOC, HAP's	
I-TH1	Paint thinner Tank #1	9 VAC5-80-720B	VOC, HAP's	
I-TH2	Paint thinner Tank #2	9 VAC5-80-720B	VOC, HAP's	
I-FP1	Fire Pump #1	9 VAC5-80-720C	NO _x , CO, SO ₂ , VOC, PM10, TSP, HAP's	
I-FP2	Fire Pump #2	9 VAC5-80-720C	NO _x , CO, SO ₂ , VOC, PM10, TSP, HAP's	
I-FP3	Fire Pump #3	9 VAC5-80-720C	NO _x , CO, SO ₂ , VOC, PM10, TSP, HAP's	
I-MW1	Maintenance welding	9 VAC5-80-720B	TSP, PM10, HAP's	
I-CW1	Cavity wax application	9 VAC5-80-720B	VOC	
I-WW1	Wastewater treatment	9 VAC5-80-720B	VOC	
I-GT1	Gasoline storage Tank #1	9 VAC5-80-720B	VOC, HAP's	
I-GT2	Gasoline storage Tank #2	9 VAC5-80-720B	VOC, HAP's	
I-DT1	Diesel storage Tank #1	9 VAC5-80-720B	VOC, HAP's	
I-DT2	Diesel storage Tank #2	9 VAC5-80-720B	VOC, HAP's	

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Virginian Pilot from October 12, 2001 to October 12, 2001. The proposed permit and the statement of basis will be available for viewing at the Tidewater Regional Office, 5636 Southern Blvd, Virginia Beach, VA. 23462. Comments will be received on the proposed permit for thirty days, ending November 12, 2001.